E FILED ON 06/29/2020 THOMAS E. CROWE, ESQ. THOMAS E. CROWE PROFESSIONAL LAW CORPORATION 2830 Son Jones Blvd. Suite 3 Las Vegas, Nevada 89146 (702) 794-0373 Nevada State Bar no. 3048

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEVADA

In re:)	BANKRUPTCY NUMBER:
)	BK-S- 20-12890-MKN
PLAYERS NETWORK,)	Chapter 11
)	•
Debtor.)	Date:
		Time:

MOTION TO CONVERT TO STANDARD CHAPTER 11

COMES NOW Debtor, by and its attorney, THOMAS E. CROWE, ESQ., and moves this Honorable Court for an Order converting the above-entitled case to one under Chapter 11 of the United States Bankruptcy Code.

This request is made and based upon papers and pleadings on file herein, the attached points and authorities, and oral argument at the time of hearing in this matter.

DATED this 29th day of June, 2020.

THOMAS E. CROWE PROFESSIONAL LAW CORPORATION
/s/ THOMAS E. CROWE
THOMAS E. CROWE, ESQ.
State Bar No. 3048
2830 S. Jones Blvd., Suite 3
Las Vegas, NV 89146
Attorney for Debtor

POINTS AND AUTHORITIES

On or about June 17, 2020, the aforementioned Debtor filed for relief under Subchapter V of Chapter 11 of the Bankruptcy Code. The Debtor herein is requesting that this Court enter an order converting this case to one under Chapter 11 based upon its qualifications as a Small Business Debtor. Due to its securities registered with the U.S. Securities and Exchange Commission, Debtor does cannot be considered a Small Business and therefore does not qualify for relief under Subchapter V of Chapter 11. Subsequently, upon conversion, Debtor-in-Possession requests that it be substituted in as Trustee.

THEREFORE, Movant respectfully requests an order converting this case to a Standard Chapter 11 and that Debtor-in-Possession be substituted in as Trustee.

DATED this 29th day of June, 2020.

Respectfully Submitted,

THOMAS E. CROWE PROFESSIONAL LAW CORPORATION

By /s/ THOMAS E. CROWE THOMAS E. CROWE, ESQ. State Bar No. 3048 2830 S. Jones Blvd., Suite 3 Las Vegas, NV 89146 Attorney for Debtor

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AFFIDAVIT OF MARK BRADLEY

STATE OF NEVADA)

ss:

COUNTY OF CLARK)

MARK BRADLEY being first duly sworn, deposes and says:

- 1. That Affiant is competent to testify to all the matters contained herein upon his own personal knowledge.
- 2. That Affiant is authorized and directed to execute and deliver all documents necessary to perfect the filing of the Chapter 11 voluntary bankruptcy.
- 3. That Affiant believes this to be an urgent matter in that his case cannot proceed under the current rules of Chapter 11 Subchapter V.
- 4. Therefore, Affiant requests that the Court convert this case to a Standard Chapter 11 and that Debtor-in-Possession be substituted in as Trustee.

<u>/s/ MARK BRADLEY</u> MARK BRADLEY

SUBSCRIBED and SWORN to before me

this 29th day of June, 2020.

/s/JANE NOBLE
JANE NOBLE
NOTARY PUBLIC in and for said
County and State.

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E FILED ON THOMAS E. CROWE PROFESSIONAL LAW CORPORATION tcrowelaw@yahoo.com Nevada State Bar no. 3048 2830 S. Jones Blvd. #3 Las Vegas, Nevada 89146 (702) 794-0373 Attorney for Debtors

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEVADA * * * * * *

In re:) BANKRUPTCY NUMBER:
PLAYERS NETWORK,) BK-S- 20-12890-MKN) Chapter 11
Debtor.) Date:) Time:
PROPOSED ORDER RE:	MOTION TO CONVERT TO STANDARD CHAPTER 11
This matter having	g come before the Court on, THOMAS E. CROWE
	ession, having been present, for good cause appearing therefore, it
is therefore ORDERED AND DE	
THAT the above-e	ntitled matter be converted to a Standard Chapter 11 of the United
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States Bankruptcy Code.

THAT the Debtor-In-Possession shall be substituted in as Trustee in its case.

Respectfully Submitted by:

THOMAS E. CROWE PROFESSIONAL LAW CORPORATION

By <u>/s/THOMAS E. CROWE</u>
THOMAS E. CROWE, ESQ.
2830 S. Jones Blvd. #3
Las Vegas, NV 89146
Attorney for Debtors

In Accordance with LR 9021, counsel submitting this document certifies that the order
accurately reflects the court's ruling and that (check one).
The Court has waived the requirement set forth in IR 9021(b)(1)
No party appeared at the hearing or filed an objection to the motion
I have delivered a copy of this proposed order to all counsel who appeared at the hearing, and any unrepresented parties who appeared at the hearing, and each has approved or disapproved the order, or failed to respond, as indicated below [list each party and whether the party has approved, disapproved, or failed to respond to the document]: I certify that this is a case under Chapter 7 or 13, that I have served a copy of this order with the motion pursuant to LR 9014(g), and that no party has objected to the form or content of he order.

By <u>/s/THOMAS E. CROWE</u> THOMAS E. CROWE, ESQ.